

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

UNITED STATES OF AMERICA) Criminal No. 2:22-cr-993-RMG
)
v.) **DEFENDANT'S NOTICE TO COURT**
) **REGARDING USE OF EXPERT TESTIMONY**
JONATHAN RAMACI) **AT SENTENCING HEARING**
)

Defendant Jonathan Ramaci (“Defendant”), by and through his undersigned attorneys, hereby notifies the Court that Defendant does not intend to offer expert testimony during the Defendant’s sentencing hearing.

On December 16, 2024, the Court entered the following text order:

TEXT ORDER as to Jonathan Ramaci: If Defendant intends to offer expert testimony during the Defendant's sentencing hearing, he must file a written expert report on or before 1/1/25. The Government may then file an expert report in response on or before 1/10/25. If Defendant determines not to offer expert testimony at the sentencing hearing, he should provide the Court and the Government notice on or before 1/1/25. AND IT IS SO ORDERED. ECF # 128.

In full disclosure to the Court and the Government, the Defendant has obtained an expert report regarding the Government’s tax loss calculations and Defendant will solely offer the said report as mitigation. Unless otherwise ordered by the Court, Defendant intends to provide the Court and Government said expert report when he files his anticipated sentencing memorandum and motion for downward departure and/or variance.

Respectfully submitted,

/s/ Joseph P. Griffith, Jr. (Fed. ID. 2473)
Joe Griffith Law Firm, LLC
946 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
(843) 225-5563
joe@joegriffith.com

Attorneys for Jonathan Ramaci

Jerry N. Theos
Gordon E. Hay
11 State Street
Charleston, SC 29401
(843) 577-7046
jerry@theoslawfirm.com
gordon@theoslawfirm.com

